

National Glass Pty Ltd recognises that privacy is important to individuals and that each person has the right to control their own personal information. National Glass Pty Ltd's policy for dealing with the disclosure of any personal information is explained below. This policy covers all personal information held where an individual may be reasonably identified from that information.

### **Collecting Information**

National Glass Pty Ltd will collect only information that is necessary for one or more business activities. When personal information is collected from an individual it will be done in accordance with the law.

The business will ensure that either at, or before the time (or if this is not possible as soon as is practical after) personal information about an individual is collected, all reasonable steps will be taken to ensure that the individual is aware of:

- The identity of the organisation and how it may be contacted;
- The purposes for which the information is retained;
- How access to the information can be gained;
- Any law that requires the information to be collected;
- Any third parties to whom the information may be disclosed; and
- Any consequences that not providing either part or all of the information may have on the individual.

Whenever it is reasonably necessary to collect personal information from third parties about an individual, reasonable steps will be taken to advise the individual as soon as is practical. The individual will be made aware of the same information they would be entitled to if the information was being collected from them directly.

If *sensitive information* (as defined under the *Privacy Act 1988*), is collected it will be treated with the utmost security and confidentiality. It will not be collected for any purpose other than that which the individual's consent was obtained, unless the Privacy Act requires otherwise.

### **Use and Disclosure**

Personal information will only be disclosed in accordance with the Privacy Act.

This means that personal information may be disclosed:

- For the purposes that it was collected and any related purpose that an individual would reasonably expect;
- When the individual has consented;

- If the disclosure is necessary or believed in good faith to be necessary to comply with the law or legal processes served upon the business (in which case a note will be made on the individual's file),
- To protect the personal safety of any person in an emergency; and
- Under other circumstances where permitted under the Act.

### **Unauthorised Disclosure or Access**

National Glass Pty Ltd is committed to protecting the privacy of individuals. Unauthorised disclosure of, or access to, personal information by employees, contractors or agents is a serious breach of this policy. Appropriate action (which may include disciplinary or legal action) will be taken in such cases.

### **Access to Personal Information**

Individuals have a right to ask for information about the type of personal information retained about them, why it is retained, how it is collected, stored, used and to whom it may be disclosed. Requests should be submitted in writing to the Payroll Manager.

A written response will be provided to the individual granting them access to their own personal information except in any case where providing such access:

- Could cause a serious and imminent risk to any person's health or safety;
- Could have an unreasonable impact on another individual's privacy;
- Is frivolous or vexatious; or
- Under any other circumstances as set out in the Act.

In all cases where access is denied, a written response will be provided outlining the reasons behind the denial.

### **Employee Records**

Employees consent to the collection of information including health information but only to the extent that it is required to manage:

- The workplace generally;
- The health and safety of an individual, particularly in the case of injury; and
- The responsibilities (including legal responsibilities) of the business.

All health information will be kept securely and steps taken to ensure it is accurate, complete, up to date and relevant to business functions. Health information will only be made available to other staff on a need to know or need to disclose basis with a note made on the individual's file of any such disclosure.

Employees consent to the disclosure of information to third parties but only to the extent that it is required to manage:

- The workplace generally;
- The health and safety of an individual, particularly in the case of injury; and
- The responsibilities (including legal responsibilities) of the business.

### **Security**

All personal information collected will be managed confidentially and securely and destroyed appropriately when no longer required.

Technical advances in the management and safeguarding of information will be reviewed and monitored. Any improvements will be implemented on an as necessary and commercially viable basis.

### **Data Quality**

Reasonable steps will be taken to ensure that all personal information that is collected, used and disclosed is accurate, complete and up to date. It is important that any changes to personal information are reported. Requests to change personal information must be submitted in writing to the Payroll Manager.

### **State Legislation**

In addition to this policy, the company will act in line with all relevant state legislation.

### **Policy Availability**

This policy will be made available on the company intranet as well as upon request.

### **Policy Review**

This policy will be reviewed on a three yearly basis.

### **Policy Breaches**

Breaches of this policy may subject the company to significant financial penalties and liabilities. Any breach of this policy by an employee will be deemed serious misconduct and in some instances could lead them to be held personally liable for breaching the Privacy Act. The company will take appropriate disciplinary action (which may include termination) against any person found to have breached this policy.

**Policy Statement**

This policy operates as a direction by National Glass Pty Ltd, but does not form part of the employee's employment agreement, does not vest any enforceable rights in the employee, cannot be implied into the employee's employment agreement and is not binding National Glass Pty Ltd in any way whatsoever.